

Jose Torres  
J-2020-03855  
Essex County Jail  
354 Doremus Avenue  
Newark, NJ 07105

CLERK  
U.S. DISTRICT COURT  
NEWARK, NJ

RE MAILED 3/11/23

March 10, 2023

Honorable Judge Martinotti, U.S.D.J.  
50 Walnut Street  
Newark, NJ 07102

Case No. 20-418 (BRM)

Re: Request for a prostitution expert

*motion*  
**PLEASE FILE THIS LETTER EX PARTE AND UNDER SEAL**

Dear Judge Martinotti,

I am requesting funds to hire a prostitution expert to come and testify at trial since the Government alleges that the Defendant enticed the escorts by promising them "exorbitant rates" and that the Sher Tremonte prostitutes/escorts are alleged victims of sexual assault or violence.

This expert will testify at trial that prostitutes/escorts who are selling their services on the internet cannot be persuaded, induced, or enticed to sell their services. This expert will also testify that when prostitutes/escorts do not get paid, they make false allegations of sexual assault and violence. Without this expert, "there exists a reasonable probability both that an expert would be of assistance to the defense and that denial of expert assistance would result in a fundamentally unfair trial."

Please advise of your authorization for a prostitution expert.

Respectfully Submitted,

*Jose Torres* *O. O. Torres*

Jose O. Torres

*O. O. Torres*  
3/11/2023